

**IN THE COURT OF COMMON PLEAS
DAUPHIN COUNTY, PENNSYLVANIA**

IN RE: : **SUPREME COURT OF PENNSYLVANIA**
: **E.D. MISC. DKT. 2006**
THE TWENTY-FOURTH STATEWIDE :
: **DAUPHIN COUNTY COMMON PLEAS**
INVESTIGATING GRAND JURY : **NO. M.D. 2006**
:
: **NOTICE NO. 31**

ORDER SEALING PRESENTMENT NO. 17

The Court has accepted Presentment No. 17. This presentment shall be sealed and no person shall disclose a return of the Presentment except when necessary for issuance and execution of process, or as otherwise directed or permitted by order of the supervising judge.

SO ORDERED this ____ day of _____, 2006.

BARRY FEUDALE
Supervising Judge
The Twenty-Fourth Statewide Investigating
Grand Jury

**IN THE COURT OF COMMON PLEAS
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IN RE: : **SUPREME COURT OF PENNSYLVANIA**
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ORDER ACCEPTING PRESENTMENT NO. 17

1. The Court finds Presentment No. 17 of the Twenty-Fourth Statewide Investigating Grand Jury is within the authority of said Grand Jury and is in accordance with the provisions of the Investigating Grand Jury Act, 42 Pa.C.S. § 4541, et seq. Accordingly, this Presentment is accepted by the Court.

2. The County for conducting the trial of all charges pursuant to this Presentment shall be Bucks County.

3. The Attorney General of the Commonwealth of Pennsylvania, or his designee, is hereby authorized to prosecute as recommended in this Presentment by instituting appropriate criminal proceedings in the aforesaid County.

SO ORDERED this ____ day of _____, 2006.

BARRY FEUDALE
Supervising Judge
The Twenty-Fourth Statewide Investigating
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TO THE HONORABLE BARRY FEUDALE, Supervising Judge:

PRESENTMENT NO. 17

We, the Twenty-Fourth Statewide Investigating Grand Jury, duly charged to inquire into offenses against the criminal laws of the Commonwealth, have obtained knowledge of such matters from witnesses sworn by the Court and testifying before us. We find reasonable grounds to believe that various violations of the criminal laws have occurred. So finding with not fewer than twelve concurring, we do hereby make this Presentment to the Court.

Foreperson The Twenty-Fourth Statewide
Investigating Grand Jury

DATED: _____, 2006

INTRODUCTION

We, the members of the Twenty-Fourth Statewide Investigating Grand Jury, having received evidence pertaining to allegations regarding violations of the Crimes Codes and of the Controlled Substance, Drug, Device and Cosmetic Act, occurring in and around Bucks and Philadelphia Counties, Pennsylvania, pursuant to Notices of Submission of Investigations No.31, do hereby make the following findings of fact and recommendation of charges:

FINDINGS OF FACTS

In June 2006, this grand jury began hearing testimony stemming from an investigation conducted by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control (“BNIDC”), into illegal drug trafficking in Bucks and Philadelphia Counties, Pennsylvania. BNIDC Agent Kirk Schwartz testified concerning the illegal drug trafficking activities of 15 individuals: John Kovaks, who is also known as “Shameless”; John Napoli, who is also known as “Junior”; William Johnson, Jr., who is also known as “Tattoo Billy”; Christopher Quattrocchi, who is also known as “Slam”; James Fostinis, who is also known as “Coffin”; Kenneth Steinmuller, who is also known as “Chains”; Frederick Freehoff, who is also known as “Pan-head Fred”; Charles Kulow, who is also known as “Ruthless”; Thomas Heilman, Jr., who is also known as “Fuzzy”; Bridget Dale, who is also known as “Scary-Movie”; Thomas Connor, who is also known as “Tommy Trash”, and who is also known as “Crypt Keeper”; James Coyle, Jr., who is also known as “Nazi Jimmy”; Dave Frenier, who is also known as “The Jew”; Robert Traverse, who is also known as “Molly”, and who is also known as “Bob”; and Arthur Bono, Jr.

On June 16, 2006, and July 17, 2006, Agent Schwartz testified that in July of 2005, he received information from a confidential informant (“the CI”) about the Breed Outlaw Motorcycle Gang selling crystal methamphetamine in Bucks County, Pennsylvania. The CI stated that he/she could purchase

crystal methamphetamine from Breed members or associates. The CI eventually purchased crystal methamphetamine from Breed member William Johnson, Jr., who is also known as "Tattoo Billy." Prior to several of the transactions between the CI and "Tattoo Billy", the CI called Johnson at the telephone facility bearing number 215-647-XXXX to arrange the transactions, to discuss the availability of controlled substances, and to discuss the time for each transaction. BNIDC agents eventually obtained a non-consensual court order to intercept Johnson telephone conversations.

On April 11, 2006, pursuant to an application made by Thomas W. Corbett, Jr., Attorney General for the Commonwealth of Pennsylvania, Judge Jack A. Panella of the Superior Court of Pennsylvania, issued an order authorizing the interception of wire and electronic communications of Johnson's conversations on his cellular telephone. Johnson had his cell phone's bill addressed to a tattoo shop in Bensalem, Bucks County, Pennsylvania. On April 13, 2006, BNIDC agents began the interception of communications on Johnson's telephone.

BNIDC agents were able to identify Johnson's drug supplier and on whose behalf he distributed crystal methamphetamine. The intercepted telephone conversations and surveillance by BNIDC agents led them to believe that Johnson delivered illegal drugs in Bucks and Philadelphia Counties. BNIDC agents determined from the intercepted telephone conversations that John Napoli, who is also known as "Junior", and who is the president of the Pennsylvania Chapter of the Breed Outlaw Motorcycle Gang (hereinafter referred to in this document as OMG), orchestrated Johnson's acquisition and distribution of crystal methamphetamine.

Agent Schwartz testified that after he learned that John Napoli directed the acquisition of the crystal methamphetamine, BNIDC agents obtained approval from the court for a series of non-consensual interceptions on John Napoli's cell phone. On May 3, 2006, pursuant to the application of the Attorney General, Judge Panella issued an order authorizing the interception of John Napoli's

conversations on his cell phone used primarily in Bucks County, Pennsylvania. On May 4, 2006, BNIDC agents started intercepting communications on Napoli's telephone.

On June 16, 2006, and July 17, 2006, Eric XXXXX, who was also known as "XXXX", testified before the grand jury. XXXXX testified that he was a Breed member and he delivered crystal methamphetamine for John Napoli and William Johnson. XXXXX estimated that from 2005 to June of 2006, he delivered a minimum of a hundred pounds of crystal methamphetamine for Napoli. On July 18, 2006, Jeffrey XXXXX testified before the grand jury. XXXXX testified that he "hung around" the Breed OMG, and he delivered crystal methamphetamine for Napoli. XXXXX estimated that in 2005, he delivered approximately eighteen pounds of crystal methamphetamine for Napoli. On July 17, 2006, Agent Schwartz introduced the non-consensual intercepted conversations from Napoli's and Johnson's phones that supported XXXXX testimony. Agent Schwartz concluded that Napoli and the Pennsylvania Chapter of the Breed OMG were responsible for distributing over 125 pounds of crystal methamphetamine from May of 2005 to June of 2006. Agent Schwartz further testified that the street level value for this crystal methamphetamine would be \$11,250,000.00. On July 18, 2006, Agent Jeffrey Aster testified before the grand jury regarding thirteen search and seizure warrants that law enforcement agents and officers executed on June 6, 2006, and on subsequent dates at various locations throughout Bucks and Philadelphia Counties. Agent Aster testified that BNIDC agents seized approximately twenty-two pounds of crystal methamphetamine, approximately \$500,000.00 in United States currency and bank deposits, forty-four firearms including one sub-machine gun, ten improvised explosive devices, and various vehicles including twenty-four motorcycles. Many of the motorcycles and weapons were owned by people who had reported them as stolen. On July 18, 2006, Detective Michael Mosiniak from the Bucks County District Attorney's Office testified about the Pennsylvania Chapter of the Breed OMG. Detective Mosiniak testified that the Breed OMG had terrorized lower

Bucks County for several decades by committing crimes that involved illegal drug dealing, thefts, extortion, witness intimidation, and assaults. In their testimony before the grand jury, Loeb sack and XXXXX identified the following people and their role in this drug trafficking organization. Agents Schwartz and Aster provided information about the following people concerning their participation in the drug organization, supporting information including surveillance reports, and items seized from these people as a result of the search warrants executed on June 6, 2006.

John Kovaks, a/k/a “Shameless”, Mother Club Chapter President of New Jersey Breed OMG

XXXXXX testified that Kovaks is the President of the Mother Club Chapter of the New Jersey Breed Outlaw Motorcycle Gang, and Kovaks identifies himself with the nickname of “Shameless.” XXXXX further testified that approximately every three weeks at John Napoli’s direction, he would deliver quarter pound (approximately 112 grams) quantities of crystal methamphetamine to Kovaks at Napoli’s house in Levittown, Bucks County. XXXXX testified that on six occasions from the late spring to the early fall of 2005, at John Napoli’s direction, he delivered quarter pound quantities, and on one occasion six ounces (approximately 170 grams) of crystal methamphetamine to Kovaks at Napoli’s home. Agent Schwartz introduced intercepted telephone conversations that led to drug deliveries between Kovaks and Napoli. These calls also supported XXXXX testimony.

John Napoli, a/k/a “Junior”, President of the Pennsylvania Chapter of the Breed OMG

XXXXXX testified that he has known John Napoli for approximately ten years, and that during the summer or fall of 2005 he started “prospecting” for the Breed OMG. XXXXX further testified that before he prospected, Napoli started directing him to deliver crystal methamphetamine to numerous people, including other Breed members. XXXXX estimated that he has delivered on Napoli’s behalf a minimum of over one-hundred pounds of crystal methamphetamine. XXXXX stated that all of these deliveries occurred in Bucks County, and were in various amounts ranging from an ounce to a pound.

XXXXXX testified that he was Napoli's business partner, and that Napoli ran a contracting business that Napoli used as a front to cover the profits he made from the distribution of crystal methamphetamine, and stolen property that he had received including motorcycle parts, tools, and other construction equipment. XXXXX further testified that between the spring and fall of 2005, Napoli would receive between five and ten pounds of crystal methamphetamine at his home, and then Napoli would direct XXXXX, XXXXX, and another Breed club member to deliver one pound quantities of crystal methamphetamine to various locations in Bucks County. Napoli would further instruct XXXXX to "stash" additional pound quantities of crystal methamphetamine until they were needed. XXXXX stated that he delivered approximately fifteen pounds of crystal methamphetamine for Napoli during the late spring to the early fall of 2005. XXXXX eventually decided that he no longer wanted to be associated with the Breed OMG, nor remain Napoli's "business partner." When he tried to cut his ties with Napoli, Napoli told XXXXX that he owed him \$25,000.00. When XXXXX refused to pay the \$25,000.00, Napoli told XXXXX wife that he would pour gasoline on XXXXX and set him on fire. When XXXXX left the club, he returned three pounds of crystal methamphetamine that he had "stashed" for Napoli to another Breed club member.

Agent Schwartz testified that John Napoli is the President of the Pennsylvania Chapter of the Breed Outlaw Motorcycle Gang. Agent Schwartz introduced intercepted conversations from Napoli's and Johnson's cell phones that supported his belief that John Napoli directed the crystal methamphetamine distribution by the Breed in Pennsylvania and New Jersey. Agent Schwartz introduced calls that led to drug deliveries between Napoli, Johnson, Kovaks, Dale, Coyle, and others. Agent Schwartz also introduced telephone calls between Napoli, Johnson, and Dale that showed Dale had paid Napoli with cash to satisfy prior drug debts when she obtained additional crystal methamphetamine from Napoli. XXXXX in his testimony corroborated Agent Schwartz's interpretation

that these calls involved “fronted” crystal methamphetamine deliveries and repayment in cash with drug proceeds. Agent Schwartz also testified that the term “front” means the drug trafficker gives the drugs with the expectation that the recipient will later repay the debt to the drug trafficker from the recipient’s drug profits. Agent Schwartz further testified that in Bucks County, a gram of crystal methamphetamine currently sells for \$200.00 per gram, and an ounce of crystal methamphetamine sells for between \$3,000.00 and \$4,000.00, and a pound of crystal methamphetamine would have a street level distribution value of \$90,000.00. Agent Schwartz stated that based upon XXXXX and XXXXX testimony, that since the spring of 2005, John Napoli has distributed a street level value of over \$11,000,000.00 worth of crystal methamphetamine in Pennsylvania and New Jersey. Agent Schwartz further testified that Napoli had not reported any income either in his name or his construction companies’ names (Napoli Home Improvements and Napoli Construction) with the Pennsylvania Department of Labor and Industry for the 2005 tax year and the first quarter of the 2006 tax year. Agent Schwartz also introduced intercepted phone conversations in which Napoli shows his disdain for law enforcement, including the BNIDC agents who served search and seizure warrants on his house. After Napoli hid in New Jersey on June 6, 2006, (the date of the execution of the search warrants), in a reference to the law enforcement officers who had executed search warrants on his residence and club house, he stated that “maybe one day they’ll get shot in the head while on the job,” and “maybe somebody will rape their mothers with a hot curling iron.” Another example of Napoli’s disdain for law enforcement occurred in intercepted phone calls on May 12, 2006, when Napoli was trying to recover a pound of crystal methamphetamine that Quattrocchi had stashed at “Nazi Jimmy’s” house in Philadelphia. Napoli was extremely upset that “Nazi Jimmy” was not home, and it looked like his drug deal was going to fall through. Napoli sent XXXXX to get the methamphetamine from “Nazi Jimmy”. In an intercepted call, XXXXX stated that he could not get through because of the funeral for the officer

(Philadelphia Police Officer Gary Skerski). Napoli said that the funeral must be for that “f--ing pig,” and they were burying that “f--ing pig over by where they buried Louie at.”

Agent Aster testified that BNIDC agents obtained probable cause to search John Napoli’s residence located on 268 Appletree Drive, Levittown, Bucks County, Pennsylvania. BNIDC agents at this location seized two loaded handguns, two high capacity assault rifle magazines and ammunition, Breed paraphernalia, and a money counter. BNIDC financial agents also seized four safety deposit box keys that were under Napoli’s girlfriend’s name. BNIDC agents obtained additional search and seizure warrants for these boxes and recovered \$120,000.00 in United States currency. BNIDC agents also seized a 2005 Volvo S-40 Turbo sedan, a 2003 Chevrolet Trailblazer SUV, a 1990 Corvette, a 1992 and a 1979 Harley Davidson motorcycle, a custom motorcycle, a 1999 Dodge dump truck, and a 2002 Ford pick-up truck. BNIDC agents also searched two storage lockers that were associated with Napoli. The first storage locker located in Middletown, Bucks County, Pennsylvania, contained three Harley Davidson motorcycles that were reported stolen to law enforcement, a handgun, a shotgun, and a STEN Mark V sub-machine gun. The second storage locker located in Levittown, Bucks County, Pennsylvania, contained approximately one pound of crystal methamphetamine, seven handguns, and ten rifles that included four assault weapons. Agent Aster testified that Napoli has been convicted of an offense that prevents him from lawfully possessing a firearm.

Agent Aster also testified about a search and seizure warrant that was executed by BNIDC agents at the residence of Ronnie Koon, who is also known as “Saint”. Agent Aster stated that Koon is the Treasurer for the Pennsylvania Chapter of the Breed OMG. BNIDC agents recovered approximately \$115,000.00 in United States currency, Breed paraphernalia, club meeting minutes for the Breed OMG, and the checkbooks for the Pennsylvania Chapter of the Breed OMG and the New Jersey Breed OMG. Agent Schwartz introduced an intercepted telephone conversation that occurred between Napoli and

Koon after the execution of the search warrant. In the call, Koon told Napoli that “they (law enforcement) were here too; we’re both a lot poorer.”

William Johnson, Jr., a/k/a “Tattoo Billy”, executive member of the Pennsylvania Breed OMG

XXXXXX testified that he knows William Johnson, Jr. as “Tattoo Billy”, and that he is an executive board member of the Breed OMG. XXXXX further testified that he started getting crystal methamphetamine from William Johnson beginning in the winter of 2006, and XXXXX testified that approximately every two weeks he would pick up five pounds of crystal methamphetamine from “Tattoo Billy” in Philadelphia. He would then take it back to Levittown in Bucks County and store it until Napoli would tell XXXXX to whom he should deliver the methamphetamine. Agent Schwartz testified that he believed that “Tattoo Billy” met Napoli before every major methamphetamine purchase that he made on behalf of the Breed. Agent Schwartz introduced surveillance reports and intercepted conversations from Johnson’s and Napoli’s phones that supported his belief that Napoli directed the Breed’s acquisition of methamphetamine and that Johnson was the Breed’s source of supply. Agent Schwartz also introduced intercepted phone calls that led to drug deliveries and money laundering between Johnson, Napoli, Traverse, XXXXX, Kulow, Freehoff, Quattrocchi, and others. Agent Schwartz testified that Johnson was associated with a tattoo shop called the “House of a 1000 Tattoos,” in Bensalem, Bucks County, Pennsylvania, and that the Breed used this as a front for the distribution of crystal methamphetamine. XXXXX added in his testimony that although Johnson was a tattoo artist, he rarely worked at the tattoo shop. Agent Schwartz further testified that Johnson had not reported any income either in his name or “The House of 1000 Tattoos” with the Pennsylvania Department of Labor and Industry for the 2005 tax year and the first quarter of the 2006 tax year.

Agent Aster testified that BNIDC agents obtained probable cause to search two locations associated with Johnson. The first location at 3632 Morrell Street, Philadelphia, Pennsylvania, was a

rented residence that Johnson shared with his girlfriend. BNIDC agents at this location seized five pounds of crystal methamphetamine, an additional one and a half ounces of crystal methamphetamine, an eighth of an ounce of cocaine, three bottles of D-bol (steroids), suspected Viagra pills, a digital scale, zip-lock baggies, one handgun, martial arts knives, brass knuckles, a stolen motorcycle, Breed OMG paraphernalia, and eight improvised explosive devices. BNIDC agents also seized a 2004 Jaguar XJ, a 2004 Dodge Durango, a 2003 Mitsubishi Montero Sport, and a Harley Davidson custom motorcycle used during the investigation. The second location at 4648 Bergen Street, Philadelphia, Pennsylvania, was a residence that Johnson shared with his wife. BNIDC agents at this location seized a handgun, a shotgun, one homemade blackjack, a chrome hanging scale, and Breed OMG paraphernalia. Agent Aster further stated that BNIDC agents seized an AR-15 assault rifle belonging to Johnson from Thomas “Tommy Trash” Connor’s room above the Breed OMG club house located at 3707 Spruce Street, Bristol, Bucks County, Pennsylvania. Agent Aster testified that Johnson has been convicted of an offense that prevents him from lawfully possessing a firearm.

Christopher Quattrocchi, a/k/a “Slam”, Sergeant at Arms for the Pennsylvania Breed OMG

XXXXXX testified that Quattrocchi is the Sergeant at Arms for the Pennsylvania Chapter of the Breed OMG, and that his nickname is “Slam”. XXXXX further testified that Napoli would direct him to deliver initially ounces of crystal methamphetamine to Quattrocchi, and that eventually Napoli directed XXXXX to deliver up to pound quantities to Quattrocchi. When Johnson started to acquire the Breed’s crystal methamphetamine, Johnson would deliver the illegal drug directly to Quattrocchi. Quattrocchi apparently panicked and slowed down his distribution of crystal methamphetamine after law enforcement officers in April of 2006 arrested New Jersey Breed member James Fostinis, a/k/a “Coffin”. New Jersey police searched Fostinis’ property, and law enforcement officers recovered two ounces of crystal methamphetamine and a firearm. Quattrocchi went to Napoli with his concern that

Fostinis would “flip.” Agent Schwartz introduced intercepted conversations from Johnson’s phones that supported his belief and XXXXX testimony that Johnson supplied Quattrocchi with crystal methamphetamine.

James Fostinis, a/k/a “Coffin”, executive board member of the New Jersey Breed OMG

XXXXX testified that he knows James Fostinis as “Coffin”, and that he is an executive board member of the New Jersey Breed OMG. XXXXX further testified that Quattrocchi supplied “Coffin” with crystal methamphetamine, and that law enforcement officers arrested “Coffin” in New Jersey with two ounces of crystal methamphetamine and a firearm. XXXXX stated that Fostinis would come into Pennsylvania and pick up his crystal methamphetamine from Quattrocchi at his house in Bucks County. XXXXX testified that he delivered two ounce quantities of crystal methamphetamine over a dozen times to Fostinis either in New Jersey or in Pennsylvania. Agent Schwartz testified that he learned in April of 2006 law enforcement officers had arrested James Fostinis with approximately two ounces of crystal methamphetamine and a firearm.

Kenneth Steinmuller, a/k/a “Chains”, Secretary of the Pennsylvania Breed OMG

XXXXX testified that he knows Kenneth Steinmuller as “Chains”, and that he is the Secretary for the Pennsylvania Chapter of the Breed OMG. XXXXX testified that Steinmuller would “stash” or hold pound quantities of crystal methamphetamine for Napoli. XXXXX further testified that he believed Steinmuller obtained his crystal methamphetamine that he sold from Thomas “Fuzzy” Heilman, Jr. Agent Schwartz introduced intercepted conversations from Napoli’s phone that supported XXXXX testimony. The phone calls also showed illegal drug deliveries and money laundering between Napoli and Steinmuller.

Agent Aster testified that BNIDC agents obtained probable cause to search Steinmuller’s residence at 1018 Emily Street, Bristol, Bucks County, Pennsylvania. BNIDC agents at this location

recovered approximately eleven grams of crystal methamphetamine, approximately nine grams of powder methamphetamine, hundreds of baggies used for repacking and distributing methamphetamine, five handguns, two rifles, numerous knives and swords, Breed OMG paraphernalia, and paraphernalia that formed what can only be described as a “shrine” to Adolph Hitler and the Third Reich. Agent Aster testified that Steinmuller has been convicted of an offense that prevents him from lawfully possessing a firearm.

Frederick Freehoff, a/k/a “Pan-head Fred”, member of the Pennsylvania Breed OMG

XXXXXX testified that he knows Frederick Freehoff as “Pan-head Fred”, and that he is a member of the Pennsylvania Chapter of the Breed OMG. Napoli would direct XXXXXX to deliver an ounce of crystal methamphetamine to Freehoff on numerous occasions. XXXXXX further testified that when Johnson became the main source of supply for the Breed’s crystal methamphetamine, that Johnson would deliver the illegal drug directly to Freehoff. Agent Schwartz introduced intercepted conversations from Johnson’s phones that supported XXXXXX testimony, and that led to drug deliveries and money laundering between Freehoff and Johnson. XXXXXX testified that in 2005, while he was away on vacation, a Breed OMG member who was watching his house asked XXXXXX if he could deliver some of the crystal methamphetamine that XXXXXX was holding for Napoli to other Breed members. XXXXXX stated that when he returned from his trip in 2005, he learned that the Breed member had delivered a quarter of a pound of crystal methamphetamine to Freehoff, and a quarter of a pound of crystal methamphetamine to Heilman.

Charles Kulow, a/k/a “Ruthless”, member of the Pennsylvania Breed OMG

XXXXXX testified that he knows Charles Kulow as “Ruthless”, and that he is a member of the Pennsylvania Chapter of the Breed OMG. XXXXXX further testified that Kulow would deliver “eight ball” (eighth of an ounce) quantities of crystal methamphetamine to other people, and Kulow would

occasionally share methamphetamine with XXXXX. Agent Schwartz introduced intercepted conversations from Johnson's phones that supported XXXXX testimony, and that led to drug deliveries by Kulow to others and money laundering. Agent Schwartz also introduced a series of intercepted phone calls and surveillance reports that showed in May of 2006, Johnson delivered a pound of crystal methamphetamine to Kulow at the Breed club house. Agent Aster testified that BNIDC agents obtained probable cause to search Kulow's residence at 6405 Fulton Avenue, Bensalem, Bucks County, Pennsylvania. BNIDC agents at this location seized two homemade improvised explosive devices, seven knives, one martial arts throwing star, and Breed OMG paraphernalia. BNIDC agents at another location recovered two handguns that belonged to Kulow. Agent Aster testified that Kulow has been convicted of an offense that prevents him from lawfully possessing a firearm.

Thomas Heilman, Jr., a/k/a "Fuzzy", member of the Pennsylvania Breed OMG

XXXXXX testified that he knows Thomas Heilman, Jr. as "Fuzzy", and that he is a member of the Pennsylvania Chapter of the Breed OMG. XXXXX further testified that Napoli directed him to take crystal methamphetamine to Heilman, and that Heilman had received approximately three pounds of crystal methamphetamine. XXXXX further testified that Napoli "fronted" the methamphetamine to Heilman. Agent Schwartz testified that in 2005 he first became aware of Thomas Heilman during the Attorney General's Warlocks OMG investigation in Bucks County, Pennsylvania. Agent Schwartz stated that during the investigation he believed Heilman obtained significant quantities of powder methamphetamine from Patrick McMenamin, who was a Warlocks' associate. In 2006, McMenamin was convicted in Bucks County for distributing over twenty pounds of powder methamphetamine, and he received a state prison sentence of ten to twenty years. Agent Schwartz introduced intercepted conversations from Napoli's telephone that supported XXXXX testimony, and showed that Heilman possessed crystal methamphetamine for delivery to others. XXXXX testified that during the fall of

2005, at Napoli's direction, he delivered four ounces of crystal methamphetamine to Heilman while he was at Napoli's house. XXXXX further testified that in 2005, while he was away on vacation, a Breed OMG member who was watching his house asked XXXXX if he could deliver some of the crystal methamphetamine that XXXXX was holding for Napoli to other Breed club members. XXXXX stated that when he returned from his trip in 2005, he learned that the Breed member had delivered a quarter of a pound of crystal methamphetamine to Freehoff, and a quarter of a pound of crystal methamphetamine to Heilman.

Agent Aster testified that BNIDC agents obtained probable cause to search Heilman's residence located at 813 Pine Street, Bristol, Bucks County, Pennsylvania. BNIDC agents at this location seized approximately eight grams of crystal methamphetamine, one rifle, knives, a bucket full of clubs, some with weighted metal ends, and some that had been created from pool sticks, German helmets, swords disguised as canes, weighted gloves, and Breed OMG paraphernalia.

Bridget Dale, a/k/a "Scary Movie", methamphetamine trafficker for Pennsylvania Breed OMG

XXXXX testified that he knows Bridget Dale as one of Napoli's crystal methamphetamine distributors, and that Napoli referred to her as "Scary Movie." XXXXX further testified that at Napoli's direction he would bring pound quantities of crystal methamphetamine to Napoli's house, and Napoli would give her the methamphetamine. XXXXX further stated that Dale owed Napoli approximately \$100,000.00 for crystal methamphetamine that she had out on the "street," and that Napoli "fronted" the methamphetamine to her. XXXXX testified that he knows Napoli "fronted" Bridget Dale pound quantities of crystal methamphetamine, and that he delivered at least one pound of crystal methamphetamine to her at Napoli's house. XXXXX further stated that Dale would bring Napoli \$30,000.00 to \$40,000.00 approximately once a week. Agent Schwartz introduced intercepted conversations between Johnson, Napoli, and Dale that supported XXXXX and XXXXX testimony, and

supported Agent Schwartz's belief that Dale distributed crystal methamphetamine to others. Agent Schwartz also introduced phone calls between Napoli, Johnson, and Dale that led to illegal drug deliveries and money laundering. Agent Schwartz stated that Bridget Dale's only legitimate employment is driving a school bus for the Council Rock school district in Bucks County, Pennsylvania.

Thomas Connor, a/k/a "Tommy Trash", executive board member of the PA Breed OMG

XXXXXX testified that he knows Thomas Connor as "Tommy-Trash", and also as the "Crypt Keeper", and that he is an executive board member of the Pennsylvania Chapter of the Breed OMG. XXXXX further testified that he lives above the Breed OMG club house located at 3707 Spruce Street, Bristol, Bucks County, Pennsylvania. XXXXX testified that Connor kept an eye on the club house, and that he "protected" the club with firearms. Agent Schwartz introduced intercepted conversations from Napoli's telephone that supported XXXXX testimony, along with a phone call that showed Connor possessed a 9mm handgun during the investigation. Agent Aster testified that BNIDC agents obtained probable cause to search the Breed club house and the rooms above the club house including Connor's room. BNIDC agents from Connor's room seized six handguns, one rifle, and one AR-15 assault weapon (that belonged to William Johnson, Jr.), along with indicia of residency in Connor's name for this room. BNIDC agents also seized a firearm and Breed OMG paraphernalia from the first floor of the clubhouse. Agent Aster testified that Connor has been convicted of an offense that prevents him from lawfully possessing a firearm.

James Coyle, Jr., a/k/a "Nazi Jimmy", associate of the Pennsylvania Breed OMG

XXXXXX testified that he knows James Coyle, Jr. as "Nazi Jimmy", and that he is an associate of the Pennsylvania Chapter of the Breed OMG. XXXXX further testified that Coyle would "stash" or hold crystal methamphetamine for Quattrocchi, and during May of 2006 he held sixteen ounces (which is equals a pound) of crystal methamphetamine. XXXXX stated that Napoli wanted this pound of

crystal methamphetamine so he could sell it to someone else, but Coyle was not home on the day Napoli needed the methamphetamine. Agent Schwartz introduced intercepted telephone conversations between Napoli, XXXXX, Johnson, and Quattrocchi from Napoli's and Johnson's telephones that supported XXXXX testimony, and Coyle's possession of one pound of crystal methamphetamine. XXXXX stated that Coyle also sold Percocet pills to Quattrocchi at the Bristol Karate Club in Bucks County, Pennsylvania.

Dave Frenier, a/k/a "The Jew", prospect for the Pennsylvania Breed OMG

XXXXX testified that he knows Dave Frenier as "The Jew", and that he is a prospect for the Pennsylvania Chapter of the Breed OMG. XXXXX further testified that on Napoli's behalf in January or February of 2006, he delivered on two occasions an ounce of crystal methamphetamine to Frenier. XXXXX also testified that on some occasions Frenier would "stash" or hold Napoli's drug money.

Robert Traverse, a/k/a "Bob", a/k/a "Molly", 2nd Brigade OMG

Agent Schwartz testified that Robert Traverse, who identified himself as "Bob," supplied William "Tattoo Billy" Johnson, Jr. with multiple pound quantities of crystal methamphetamine. Agent Schwartz introduced intercepted conversations between Johnson and Traverse that led to multiple deliveries of pound quantities of crystal methamphetamine between Traverse, Johnson, and Napoli. Agent Schwartz also testified that Traverse is a member of the 2nd Brigade OMG, and that this outlaw motorcycle club is loosely affiliated with the Pagans OMG. Agent Aster testified that BNIDC agents obtained probable cause to search Traverse's residence located at 8609 Jackson Street, Philadelphia, Pennsylvania. BNIDC agents at this location seized fifteen pounds of crystal methamphetamine, \$1,080.00 in United States currency, and 2nd Brigade OMG paraphernalia.

Arthur Bono, Jr.

Agent Schwartz testified that on June 5, 2006, Arthur Bono, Jr., delivered twenty pounds of crystal methamphetamine to Robert Traverse. Plymouth Township Police Department in Montgomery County, Pennsylvania, seized \$100,000.00 in United States currency from Bono. In a statement to the police, he claimed that had no idea where the money came from. Agent Schwartz introduced surveillance reports and intercepted conversations between Johnson and Traverse that supported his belief that Bono had delivered twenty pounds of crystal methamphetamine to Traverse on June 5, 2006, and that the \$100,000.00 in United States currency came from William Johnson for five of the pounds of crystal methamphetamine. Agent Schwartz believes that the remaining fifteen pounds that were seized from Traverse were either paid for in advance or were “fronted” by Bono.